

M. Christie Helmer, OSB No. 743400
chris.helmer@millernash.com
Ian Christy, OSB No. 160116
ian.christy@millernash.com
MILLER NASH GRAHAM & DUNN LLP
3400 U.S. Bancorp Tower
111 S.W. Fifth Avenue
Portland, Oregon 97204
Telephone: 503.224.5858
Facsimile: 503.224.0155

Attorneys for Plaintiff

(additional counsel listed on signature page)

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD.,

No. 3:19-CV-1671-BR

Plaintiff,

JOINT STATUS REPORT

v.

AMIS INTEGRITY S.A. *in personam* and
M/V AMIS INTEGRITY (IMO 9732412)
her engines, freights, apparel,
appurtenances, tackle, etc., *in rem*,

Defendants.

Pursuant to the Court's June 18, 2020, Order (ECF 95), Plaintiff Dry Bulk
Singapore PTE. Ltd. ("Dry Bulk") and Defendant Amis Integrity S.A.¹ ("Amis," with Dry Bulk

¹ Individually and by restricted appearance under Supplemental Admiralty Rule E(8).

and Amis collectively referred to as the “Parties”) submit the following Joint Status Report in the above-captioned matter to address general case management issues and, as specifically requested by the Court, briefing on Amis’s filed Motion to Dismiss for Process and Lack of Personal Jurisdiction:

1. The Parties propose the following general case management deadlines:
 - a. **Nov. 20, 2020:** Deadline for fact discovery motions.
 - b. **Dec. 11, 2020:** Deadline for completion of fact discovery.
 - c. **Dec. 18, 2020:** Deadline for submission of joint status report regarding dispositive motions, which per the Court’s Rule 16 Conference Order (ECF 50) will include the reason why such motions are warranted, on what grounds, whether the parties are in agreement, and a proposed schedule. If no dispositive motions are contemplated, the Parties will propose a pretrial order date and trial date by December 18, 2020.

2. Dry Bulk filed a *Motion for Leave to Amend the Verified Complaint* (ECF 61) to add proposed defendant Wisdom Marine Lines S. A. (“Wisdom”) to this action, which motion is opposed by Amis and currently remains pending before the Court. Dry Bulk desires to file an Amended Motion for Leave to Amend the Verified Complaint to **(a)** add a new plaintiff into the case (Tradewind GmbH, an entity that provided financing to Dry Bulk in connection with the transactions at issue and which also funded the \$350,000 in countersecurity posted into the Court’s Registry on June 17, 2020) and **(b)** add a veil-piercing / alter ego claim against Amis and Wisdom based upon the dispute at issue. Amis is not opposed to Dry Bulk filing an amended Motion for Leave to File an Amended Complaint in this regard, but it reserves the right to oppose such motion. The Parties have proposed the following briefing schedule for Dry Bulk’s amended *Motion for Leave to Amend the Verified Complaint*:

- a. **July 10, 2020:** Dry Bulk's deadline for filing an amended *Motion for Leave to Amend the Verified Complaint*;
- b. **July 17, 2020:** Amis's Opposition deadline.
- c. **July 24, 2020:** Dry Bulk's Reply deadline.

3. Dry Bulk believes targeted, expedited jurisdictional discovery is necessary in order for it to respond to Amis's Motion to Dismiss for Process and Lack of Personal Jurisdiction. Amis opposes jurisdictional discovery. Accordingly, within seven days of the Court's resolution of Dry Bulk's amended *Motion for Leave to Amend the Verified Complaint*, Dry Bulk will file a motion for permission to conduct expedited jurisdictional discovery. Amis will file a response within seven days from Dry Bulk's motion, and Dry Bulk will file a Reply within seven days of Amis's Opposition.

4. In the event the Court grants Dry Bulk's motion for jurisdictional discovery, within seven days from that Order the Parties will confer further and agree on an expedited jurisdictional discovery schedule to be presented to the Court, as well as the date when Amis would supplement (if necessary) its pending *Motion to Dismiss for Process and Lack of Personal Jurisdiction* (ECF 83), should Dry Bulk's amended Motion for Leave to Amend the Verified Complaint be granted. In the event the Court denies Dry Bulk's motion for jurisdictional

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discovery, Amis would supplement (if necessary) its pending *Motion to Dismiss for Process and Lack of Personal Jurisdiction* (ECF 83) within fourteen days of the Court's Order, Dry Bulk will respond within twenty-eight (28) days of the Court's Order, and Amis will reply within forty-two (42) days of that Order.

DATED this 1st day of July, 2020.

LEGROS BUCHANAN & PAUL

MILLER NASH GRAHAM & DUNN LLP

s/ Markus B.G. Oberg

Markus B.G. Oberg, OSB No. 112187
moberg@legros.com
Daniel J. Park, OSB No. 132493
dpark@legros.com
4025 Delridge Way SW, Suite 500
Seattle, Washington 98106-1271
Phone: 206.623.4990
Facsimile: 206.467.4828

Attorneys for Defendants

s/ M. Christie Helmer

M. Christie Helmer, OSB No. 743400
chris.helmer@millernash.com
Ian Christy, OSB No. 160116
ian.christy@millernash.com
3400 U.S. Bancorp Tower
111 S.W. Fifth Avenue
Portland, Oregon 97204
Phone: 503.224.5858
Facsimile: 503.224.0155

and

John D. Kimball, *pro hac vice*
jkimball@blankrome.com
BLANK ROME LLP
1271 Avenue of the Americas
New York, New York 10020
Telephone: 212.885.5000
Facsimile: 212.885.5001

and

Jeremy A. Herschaft, *pro hac vice*
jherschaft@blankrome.com
Zachary Cain, *pro hac vice*
zcain@blankrome.com
BLANK ROME LLP
717 Texas Avenue, Suite 1400
Houston, Texas 77002
Telephone: 713.632.8655
Facsimile: 713.228.6605

Attorneys for Plaintiff
Dry Bulk Singapore PTE. LTD.